

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SARA RIVERS,
(formerly known as Sara Stokes)

Plaintiff,

-against-

SEAN COMBS a/k/a “P. DIDDY, DIDDY, PUFF, PUFF
DADDY, PUFFY, BROTHER LOVE”, BAD BOY
ENTERTAINMENT HOLDINGS, INC.,
HARVE PIERRE, TRACY WAPLES,
ALISON STANLEY, CHRIS SAINSBURY,
DEVYNE STEPHENS, NORMA AUGENBLICK,
DEREK WATKINS (a/k/a FONZWORTH BENTLEY),
TONY DOFAT, MICKEY CARTER,
DERIC ANGELETTIE (a/k/a “D.Dot” and
“MADD RAPPER”), JASON WILEY,
BAD BOY ENTERTAINMENT LLC,
PHIL ROBINSON, SHAWN PEREZ,
DADDY’S HOUSE RECORDING STUDIOS,
BAD BOY PRODUCTIONS INC.,
COMBS ENTERPRISES, LLC,
UMG RECORDINGS, INC.,
JANICE COMBS, JANICE COMBS PUBLISHING INC.,
JANICE COMBS PUBLISHING HOLDINGS INC.,
SEAN JOHN CLOTHING LLC.,
PARAMOUNT GLOBAL, VIACOM,
MTV PRODUCTIONS,
JACKIE FRENCH, LOU PEARLMAN (estate of),
BUNIM-MURRAY PRODUCTIONS,
TOWNSQUARE MEDIA GROUP,
JOHN AND JANE DOES 1-50, and
DOE ORGANIZATIONS 1-10

Defendants.

Case No.: 25-cv-01726-JSR


**DECLARATION OF
CORINNE HANNA IN
SUPPORT OF DEFENDANT
UMG RECORDINGS, INC.’S
MOTION TO DISMISS
PURSUANT TO FRCP
12(b)(6)**

DECLARATION OF CORINNE HANNA

I Corrine Hanna, declare as follows under penalty of perjury:

1. I am the Vice President, People Operations & Systems for UMG Recordings, Inc. (“UMGR”) , one of the named defendants in the above-captioned action (the “Action”). The matters set forth in this Declaration are based on my personal knowledge, documents maintained in the ordinary course by UMGR and/or information provided by other UMGR employees with personal knowledge.
2. I submit this Declaration in support of UMGR’s motion to dismiss the Complaint in this Action as against UMGR.
3. The Complaint in this Action suggests (based on a negligent hiring claim and a negligence claim) that Defendant Sean Combs (“Combs”) was employed during the operative period of the Complaint (2002 to 2004) by a host of different and unrelated entities (including Paramount Global, MTV, various Bad Boy entities and UMGR, which are collectively labeled at times in the Complaint as the “RICO Orchestrators”). Speaking solely for UMGR, Combs was never an employee of that entity, nor any of its predecessors.
4. The Complaint in this Action also alleges that the Plaintiff, Sara Rivers (formerly under the name Sara Stokes) was employed by UMGR in the 2002 to 2004 time period. According to UMGR’s employment records, Ms. Rivers (or Stokes) also was not employed by UMGR.
5. The Complaint in this Action also alleges that the Plaintiff may have entered into a contract with UMGR during the period 2002 to 2004, and alleges that she was working for UMGR. According to the records of UMGR, Plaintiff had no contractual relationship with UMGR, nor, as mentioned, was she ever an employee of UMGR.

Executed on June 18, 2025

DocuSigned by:

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Corinne Hanna